ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

MM Docket No. _____

In re	)
	)
Amendment of Section 73.202 (b)	) RM-
Table of Allotments	)
FM Broadcast Stations	)
(Dundee and Odessa, NY)	)

To: The Chief, Allocations Branch

SUPPLEMENT TO PETITION FOR RULEMAKING

FINGER LAKES RADIO GROUP, INC. ("petitioner"), by its counsel, herewith submits the attached Engineering Report Supplement in connection with the above-captioned rulemaking petition.

The attached engineering supplement analyzes the allocation proposal using the following reference coordinates: 42-18-38.5 N, 76-49-02.8 W. Using these proposed coordinates, the proposal clearly passes muster without the need to undertake a Woodstock analysis.

WHEREFORE THE PREMISES CONSIDERED, it is respectfully requested that the Commission initiate a rulemaking proceeding as proposed hereinabove.

Respectfully submitted,

FINGER LAKES RADIO GROUP, INC.

By James L. Oyster
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Counsel

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Date: February 22, 2006

RADIO TECH INQUIRY

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Engineering Report Supplement
WFLR Petition for Rulemaking
To Change Principal Community
To Odessa, NY
February 2006

This supplement provides additional information to properly analyze the subject petition for rulemaking. Although the petitioner is authorized to operate with the facilities proposed in the petition, and the petitioner in entitled to analysis of its proposal to allocate channel 238A to Odessa, NY under the provisions of Woodstock and Broadway, Virginia, 3 FCC Rcd 6398 (1988), the following supplemental information is presented.

To further demonstrate that the allocation meets all requirements for principal community coverage, the petitioner submits an allocation site only 8.7 km from the furthest border of Odessa, NY that meets all spacing requirements of Section 73.207(b)(1) of the FCC rules and is grandfathered with respect to the Canadian allocation.

In allocations situations, the FCC normally utilizes a simplifying assumption of uniform terrain in analyzing principal community coverage by the 70 dbuV F(50,50) contour. This assumption is based upon the Commission's belief that there may be an impediment in utilizing any particular set of coordinates by the applicant: For example FAA approval of the specific tower height at the location proposed. If any specific site and tower is not qualified, then a uniform terrain model obviates reliance on special terrain profiles for service to the principal community.

Figure 1 of this supplement is a map showing the "uniform terrain" 70 dbuV contour of a "standard 6 kW class A" station extending 16.16 km from the allocations site proposed herein. It also shows the 70 dbuV F(50,50) contour from a standard 6 kW 100 meter HAAT station. As can be clearly seen, the 70 dbuV contour easily encompasses 100% of the boundaries of Odessa, NY as well as the showing of principal community coverage from the allocation site based upon uniform terrain.

There is no reliance on NBS Tech Note 101 analysis in this request, as the FCC standard F(50,50) curves for the actual height demonstrate complete coverage of the principal community.

The petitioner submits the following allocations study, that demonstrates that a fully spaced allocations location that easily serves Odessa, NY with 100% principal community coverage using both the uniform terrain standard and

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analyzing a "standard facility" class A FM station and the actual terrain as specified in 73.313 of the FCC rules.

ComStudy 2.2 search of channel 238 (95.5 MHz Class A) at 42-18-38.5 N, 76-49-02.8 W.

CALL	CITY		ST	CHN	CL	DIST	SEP	BRNG	CLEARANCE
	DUNDEE	*	NY	240	A	23.35	31.00	331.0	-7.6
	ODESSA	*	NY	238	A	11.28	115.00	298.7	-103.7
	BELLEVILLE	**	ON	238	C1	219.32	239.00	352.1	-19.7
910708ME	SOUTH WAVERLY		PA	241	A	43.01	31.00	161.3	12.0
CJBC1F	BELLEVILLE	**	ON	238	C1	219.32	239.00	352.1	-19.7
CJBC1F*	BELLEVILLE	**	ON	238	C1	218.90	239.00	345.7	-20.1
NEW	ITHACA		NY	235	D	17.32	0.00	54.8	17.3
NEW	ITHACA		NY	235	D	32.30	0.00	63.2	32.3
W236AK	CORNING		NY	236	D	28.84	0.00	228.9	28.8
W238AA	ITHACA		NY	238	D	32.04	0.00	63.6	32.0
W238AI	ELMIRA		NY	238	D	36.48	0.00	174.9	36.5
W238AK	BATH		NY	238	D	34.32	0.00	274.5	34.3
WAQX-FM	MANLIUS		NY	239	B1	96.79	96.00	37.1	0.8
WAQX-FM	MANLIUS		NY	239	B1	99.24	96.00	33.7	3.2
WBYL	SALLADASBURG		PA	238	A	123.07	115.00	196.5	8.1
WBYL	SALLADASBURG		PA	238	A	127.35	115.00	195.1	12.3
WFLR-FM	DUNDEE	***	NY	238	A	11.28	115.00	298.7	-103.7
WFLR-FM	DUNDEE	***	NY	240	A	23.35	31.00	331.0	-7.6
WFXF	HONEOYE FALLS		NY	236	B	87.82	69.00	328.6	18.8
WFXF	HONEOYE FALLS		NY	236	B	87.86	69.00	328.6	18.9
WLDM-LP	SANITARIA SPRINGS		NY	239	LP100	90.12	56.00	101.3	34.1
WNKI	CORNING		NY	291	B	25.14	15.00	227.7	10.1
WPHD	SOUTH WAVERLY		PA	241	A	46.13	31.00	162.0	15.1
WPIG	OLEAN		NY	239	B	134.52	113.00	257.7	21.5
WTTC-FM	TOWANDA		PA	237	A	72.81	72.00	155.6	0.8

Note: * This proceeding
** Grandfathered Canadian allocation
*** This station

This showing demonstrates that the above coordinates are clearly mutually exclusive with the authorized, and present facilities of WFLR.

Figure 2 is a series of maps showing the 60 dbuV F(50,50) service contour of the licensed WFLR-FM facilities in blue, and the same contour of a standard class A station (6 kW, 100 m HAAT) operating at the proposed allocation coordinates. In order to compare "apples with apples" actual terrain and F(50,50) curves are used for both the licensed facility and the allocation site.

The service area lost is 760.9 sq km containing 13,495 persons, while the gain area is 1639.9 sq km containing 106,079 persons with the contour developed from the allocations coordinates covers a total of 2588.2 sq km and

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134,387 persons. This analysis shows that the net gain area is 879 sq km and the net population gain is 92,584 persons.

Each of the maps in Figure 2 shows the FM signals that overlap the gain and loss areas. It can be plainly seen that both areas are well served by FM Stations.

The entire loss area will have primary protected service from at least eight aural services after WFLR-FM is relocated. In some cases, the total consists of different stations in different portions of the loss area.

The entire loss area is overlapped by WQNY and WYXL. This is shown in figure 2A. Loss and Gain areas can be clearly seen in this map.

All of the loss area not overlapped by WKPQ is overlapped by WPHR-FM.

Nearly all of the loss area not overlapped by WNKI is overlapped by WNYR-FM, and the small remaining areas are overlapped by WIII or WNVE as shown in figure 2B.

Most of the loss area is overlapped by WVOR and the remaining area is overlapped by WSQG-FM and WVIN-FM. Figure 2C show these signals cover the loss area with protected signals.

Additionally, AM stations WFLR(AM), WPIE, and WYLF all provide protected service to the entire loss area. Figure 2D shows these contours.

Several other AM stations and FM stations provide service to substantial portions of the loss area.

There is, therefore no white or grey area created by this proposal, as there are at least five FM services and three AM services to the entire loss area. There are many more stations which cover a portion of the loss area. The entire loss is well served by other stations.

There are many services to the gain area, and the petitioner makes no claim for service to white or grey areas within the gain area.

RADIOTECHNIQUES

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In conclusion, this proposal readily meets all allocations requirements on the regular allocations analysis basis using uniform terrain, at a hypothetical antenna location that is fully spaced.

This is to certify that this report has been prepared by myself, and under my direction. It is correct and accurate of my own knowledge, except where stated otherwise, and where this is so, the information is correct to the best of my knowledge and belief.

I further certify that I am a Licensed Professional Engineer in the State of New Jersey, with a B.S.E.E. degree from the Newark College of Engineering of NJIT, and that I am regularly engaged in the practice of radio engineering with the firm of Radiotechniques Engineering LLC, with offices at 402 Tenth Avenue, Haddon Heights, NJ. I am a member of the AFCCE, senior member of the IEEE, and SBE, and hold a FCC General Radiotelephone Operator License.. My qualifications are a matter of record with the FCC.

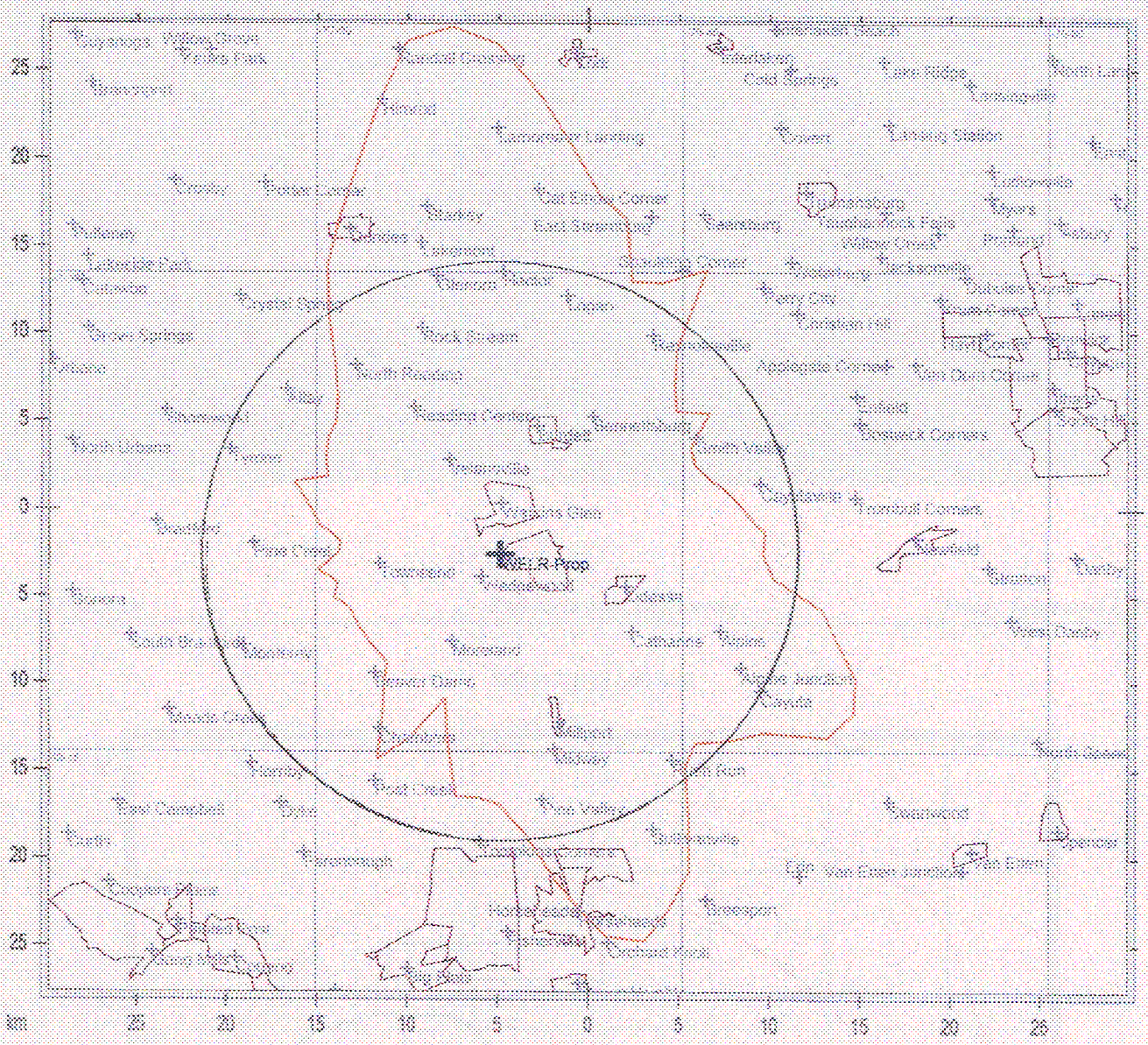
Edward A. Schober

Date: February 21, 2006

Edward A. Schober, PE

(Seal)

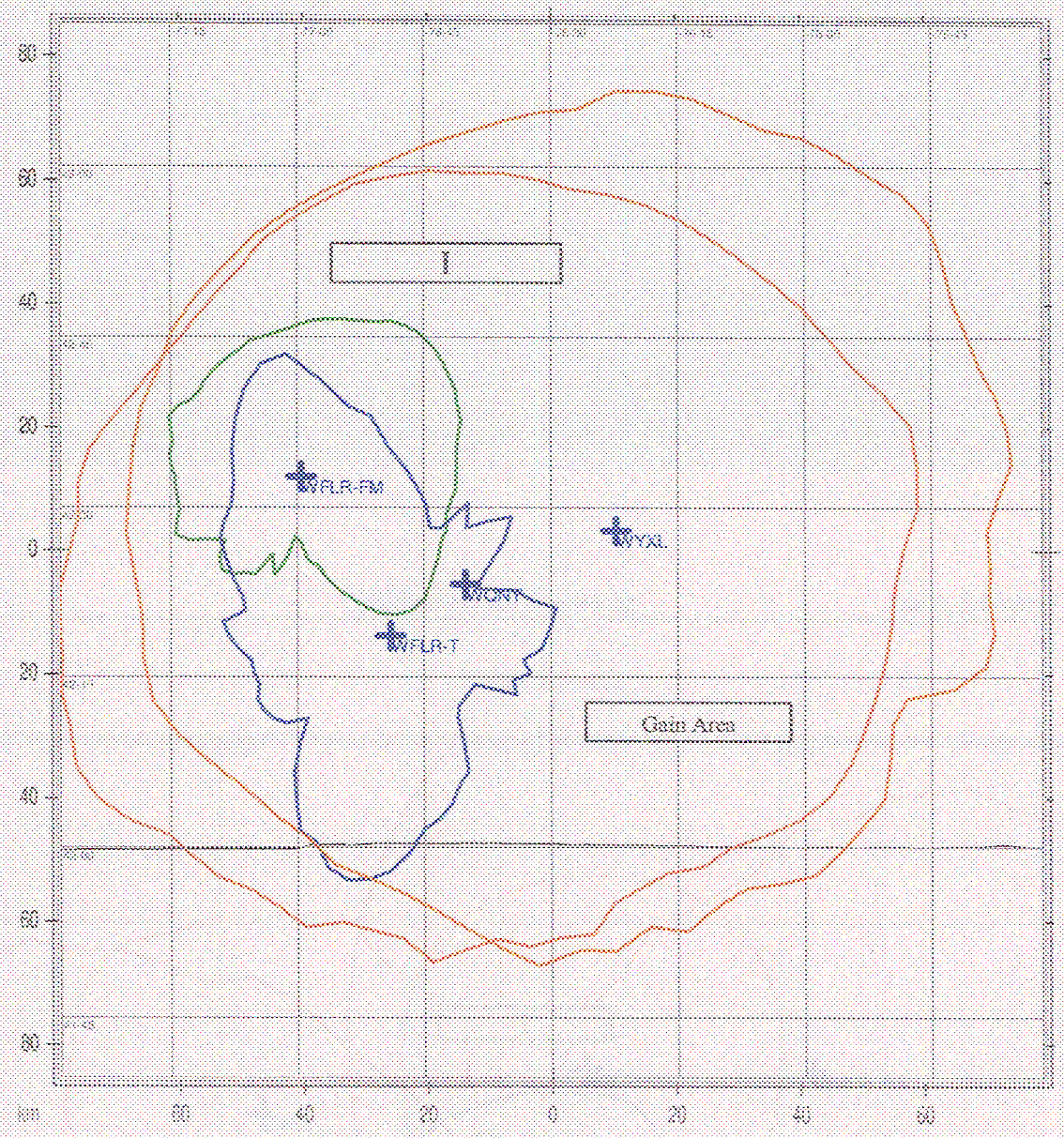
Alternate Allocation Location - Principal Community Coverage



70 dBu F(50,50) Contours and Uniform terrain model

State Borders City Borders Lat/Lon Grid

Stations Serving Loss Area

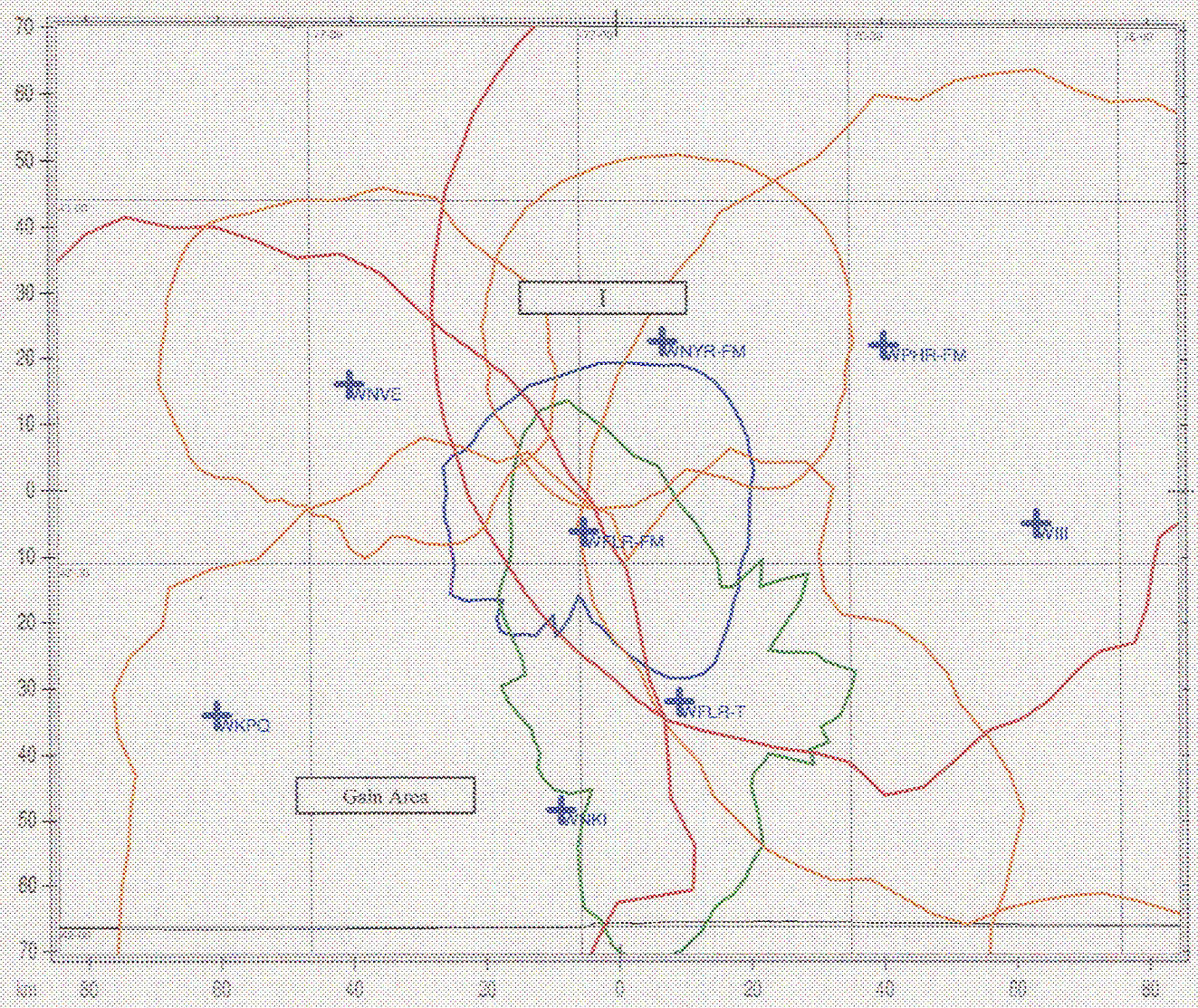


Licensed (Green) Proposed (Blue) and other Stations (Org) Service Contours

State Borders Lat/Lon Grid

Map Scale: 1:1078922 1 cm = 10.79 km VHI Size: 170.67 x 158.03 km

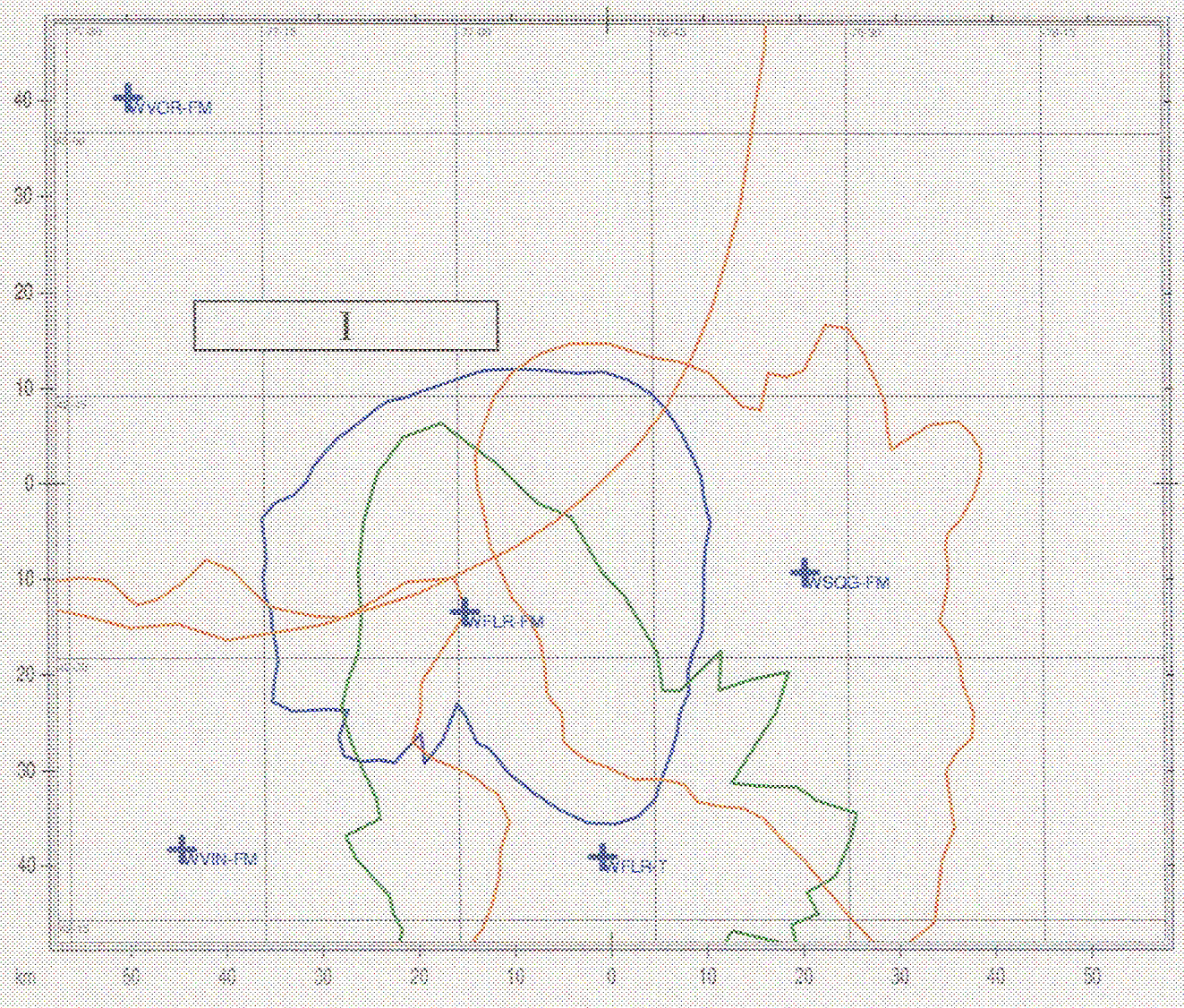
Service to Loss Area



Licensed (Blue) Proposed (Green) and other Station (Org and Red) Service Contours

State Borders LatLon Grid

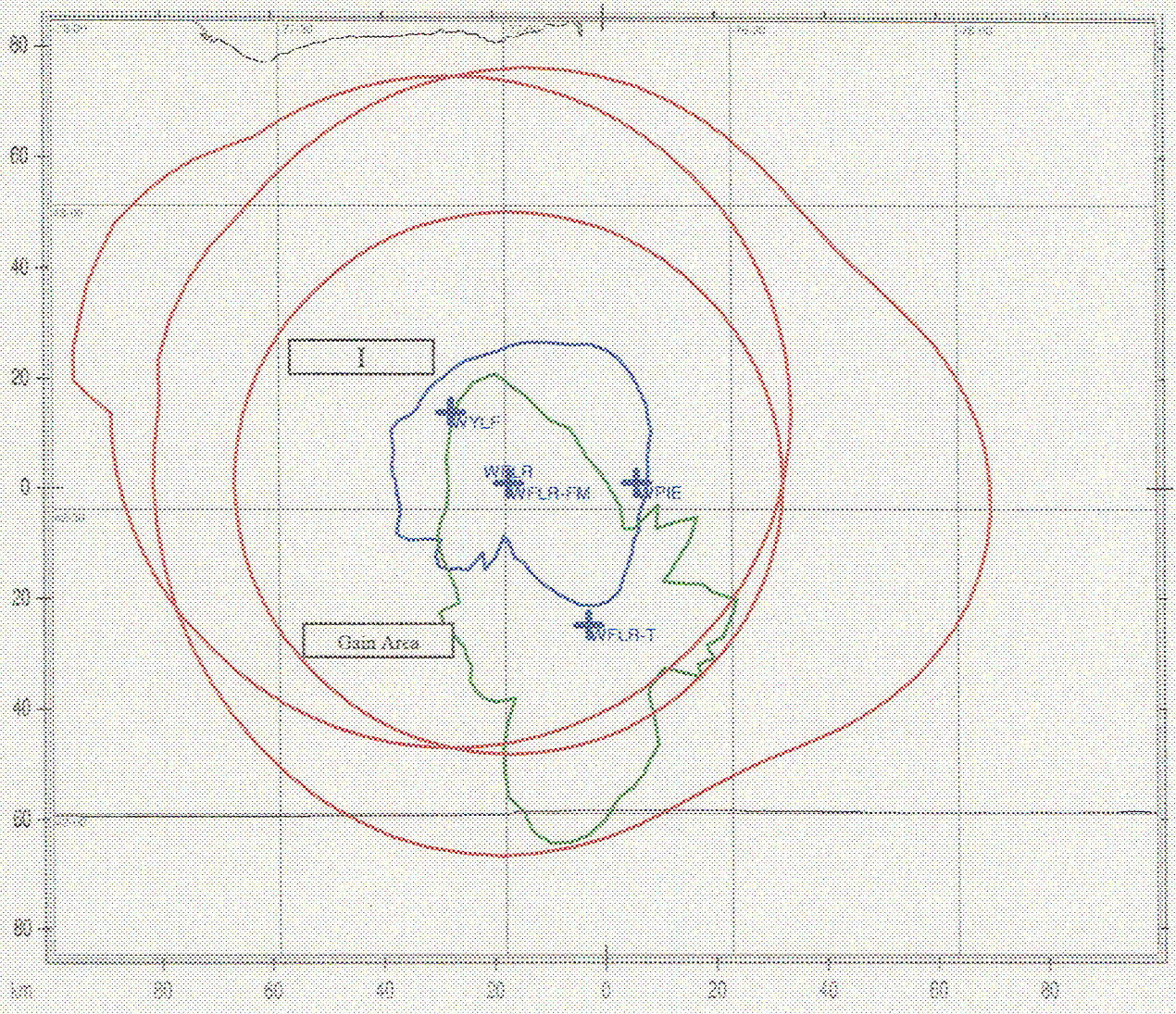
Service to Loss Area



FM Service Contours (Orange) Licensed (Blue) and Proposed (Green)

State Borders Lat/Lon Grid

AM services to Loss Area



0.5 mV/m AM Contours (Red) WFLR-FM Lic (Blue) and Proposal (Green) of the F(50,50) Contours

State Borders Lat/Lon Grid